United States District Court SOUTHERN DISTRICT OF NEW YORK

Michael Danieli, on behalf of himself and those similarly situated,

Plaintiff,

cv 3688 RWS

- against -

International Business Machines Defendant. Corporation

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Piper Hoffman

a member in good standing of

the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:

Todd F. Jackson

Firm Name:

Lewis, Feinberg, Lee, Renaker & Jackson, P.C.

Address:

1330 Broadway, Suite 1800

City/State/Zip:

Oakland, California 94612

Phone Number:

(510) 839-6824

Fax Number:

(510) 839-7839

Todd F. Jackson

is a member in good standing of the Bar of the States of

California

There are no pending disciplinary proceeding against Todd F. Jackson in any State or Federal court.

Dated: June 4, 2008

City, State: New York, NY

Respectfully submitted,

Sponsor's Piper Hoffman SDNY Bar PH 4990

Firm Name: Outten & Golden LLP Address: 3 Park Ave., 29th Floor City/State/Zip: New York, NY 10016 Phone Number: (212) 245-1000 Fax Number: (212) 977-4005

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(RWS)

SDNY (Rev. 10/2006) Pro Hac Vice Sample Affidavit

UNITED STATES DI

SOUTHERN DISTRICT OF NEW YORK

Michael Danieli, individually and on behalf of others similarly situated,

Plaintiff,

- against
International Business Machines Defendant.

Corporation

AFFIDAVIT OF
PIPER HOFFMAN
IN SUPPORT OF MOTION
TO ADMIT TODD F. JACKSON
PRO HAC VICE

3688

State of New York

County of New York)

Piper Hoffman , being duly sworn, hereby deposes and says as follows:

ss:

- 1. I am a partner at Outten & Golden LLP , counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Todd F. as counsel pro hac vice to represent Plaintiff in this matter.
- I am a member in good standing of the bar of the State of New York and was admitted to practice law in New York on 2/26/03. I am also admitted to the bars of Massachusetts and D.C. and of the United States District Court for the Southern District of New York, and am in good standing in all of these bars.
- 3. I have known Todd F. Jackson for several years.
- 4. Mr. Jackson is a partner at Lewis, Feinberg, Lee, Renaker & Jackson, P.C. in Oakland, California.
- 5. I I have found Mr. Jackson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Todd F. Jackson pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Todd F. Jackson pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Todd F. Jackson pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: 6/04/2008

City, State: New York, NY

Notarized:

Respectfully submitted,

KRISTEN G. CASILDO
Notary Public State of New York
New York County Reg #01CA6139423
Commission Expires January 9, 2010

__...__

Name of Movant: Piper Hoffman

SDNY Bar Code: PH 4990

United States District Co	URT			
SOUTHERN DISTRICT OF NEW	York			
Michael Danieli, on behalf of himself a those similarly situated,	nd Plaintiff,			
		08	cv 3688	(RW\$)
- against - International Business Machines Corpo	ration Defendar	,	ER FOR ADMISS PRO HAC VICE WRITTEN MOT	
Upon the motion of Piper Hoffi	nan atto	orney for Michael Danieli, or	n behalf of himself ar	nd those similarly situated,
and said sponsor attorney's affida	vit in support;			
IT IS HEREBY ORDERED tha	ıt			
Applicant's Name:	Todd F. Jacks	son		
Firm Name:	Lewis, Feinberg, Lee, Renaker & Jackson, P.C.			
Address:	1330 Broadway, Suite 1800			
City/State/Zip:	Oakland, CA 94612			
Telephone/Fax:	tjackson@lewisfeinberg.com			
Email Address:				
is admitted to practice pro hac vi captioned case in the United Stat		thoos on many one and a,		in the above attorneys
appearing before this Court are s discipline of attorneys. If this ac immediately apply for an ECF pa fee to the Clerk of Court.	tion is assigned t	o the Electronic Case Filir	ng (ECF) system, o	counsel shall
Dated: City, State:				
		United States District/Ma	igistrate Judge	

THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

May 22, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, TODD FRANKLIN JACKSON, #202598 was admitted to the practice of law in this state by the Supreme Court of California on September 22, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records